

BY: SKY

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 04-10194-RCL-JLA
)	
ANTHONY BUCCI, <u>et al.</u> ,)	
)	
Defendants.)	

JOINT MOTION FOR EXCLUSION OF TIME UNDER SPEEDY TRIAL ACT

In accordance with the Court's request at the arraignment held on July 15, 2004, the United States of America and the defendants, by and through their respective counsel, hereby submit this joint motion requesting the exclusion of time under the Speedy Trial Act.

The defendants initially were charged by criminal complaint and appeared to face the charges in the complaint on or about May 21, 2004. The government moved for detention and the Court conducted a detention hearing. The indictment in this case was returned on July 6, 2004.

The Court conducted the arraignments in this case on July 15, 2004. The Court scheduled an initial status conference for defendants Muolo and Jordan for August 20, 2004. The Court scheduled an initial status conference for defendant Bucci for August 24, 2004.

The parties agree that the period from July 15, 2004, through August 12, 2004, constitutes excludable delay pursuant to Local Rule 112.2(A)(2) and 18 U.S.C. § 3161(h)(8)(A). The

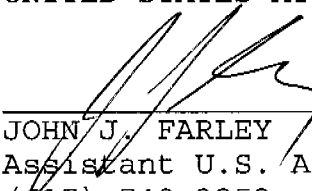
parties further agree that the additional period of time from August 12, 2004, through August 24, 2004, also constitutes excludable delay in the interests of justice, pursuant to 18 U.S.C. § 3161(h)(8)(A) because the ends of justice served by providing counsel with adequate time to review the discovery materials to be provided by the government in this case (which involved multiple wiretaps) outweigh the best interests of the public and the defendants in a speedy trial.

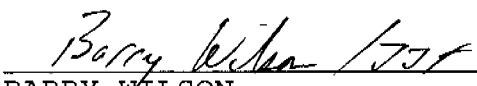
Accordingly, the parties agree that the period of time from July 15, 2004, until August 24, 2004, constitutes excludable time pursuant to 18 U.S.C. § 3161(h)(8)(A). A proposed Order is enclosed.


Respectfully Submitted,

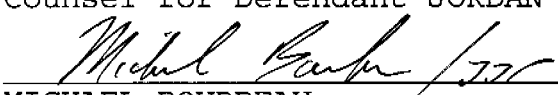
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By:


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Counsel for Defendant JORDAN


MICHAEL BOURBEAU
Counsel for Defendant MUOLO

Dated: July 26, 2004

CERTIFICATE OF SERVICE

A copy of the foregoing was sent by first class mail,
postage prepaid, to the following:

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July 26, 2004



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Assistant U.S. Attorney